

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

CRYSTAL SEAMAN,

*

*

PLAINTIFF,

*

*

VS.

*

CASE NO. 2:05-cv-414-WKW

*

FOOD GIANT SUPERMARKETS, INC.,

*

*

DEFENDANT.

*

PLAINTIFF'S PROPOSED JURY VOIR DIRE

COMES NOW, the Plaintiff, by and through her undersigned attorney and requests that the following questions be asked of the jury venire during the voir dire process:

I. Legal Qualifications to Serve

1. Are you related to the lawyers for the defendant, Honorable M. Warren Butler and Honorable Richard B. Johnson or to anyone employed at Lyons, Pipes and Cook, P.C.?

2. Have you or any of your relatives ever been employed by the defendant, Food Giant Supermarkets, d/b/a Piggly Wiggly?

II. General Inquiry

3. Have you personally met or are any of you friends or social acquaintances of the lawyers for the defendant or anyone else you believe may be associated with their office of agency? **[read letterheads]**

4. Have any of you ever owned your own business?

5. Have any of you ever run a business for someone else?

6. Have any of you or your close friends or family ever been injured at or in a grocery store?

7. Have any of you or your close friends or family ever been injured by a fall or misstep?
8. Would any one of you be unable to fairly judge a case of negligence involving a fall at a grocery store?
9. Does anyone think that persons working for a company might not or would not lie about events to protect themselves or their employer?
10. Does anyone here have feelings or thoughts against awarding an individual financial compensation for injuries that he or she has suffered?
11. Does anyone here have feelings or thoughts against awarding an individual financial compensation for pain and suffering?
12. Does anyone here have feelings or thoughts against awarding an individual financial compensation for emotional and psychological trauma he or she has suffered?
13. Has anyone, your close friends or family ever received financial compensation for any injury caused by the negligence of another?
14. Has anyone, your close friends or family ever received financial compensation for any injury caused by a slip or fall at the business of another individual?
15. Is there anyone here who, for any reason, does not feel that he or she can sit and decide this case without prejudice to one side or the other?
16. Is there anyone here who, if the evidence so warrants, will have difficulty awarding money damages against the Defendant?
17. Is there anyone who for religious, philosophical or other reasons does not believe that he or she can render a verdict in this case?

Respectfully submitted this the 24th day of July, 2006.

s/ **Charles W. Blakeney**
Charles W. Blakeney, BLA068
Attorney for Plaintiff
Post Office Box 100
Geneva, Alabama 36340
334-684-2387

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of July, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Hon. H. Warren Butler, Hon. David J. Harrison, and Hon. Richard Brantly Johnson.

s/ **Charles W. Blakeney**
Charles W. Blakeney